



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

July 6, 1998

RE: DOE FEMP
COMMENTS: A9P1 PHYSICAL
SAMPLING PSP

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed DOE's May 8, 1998 submittal "Project Specific Plan for Area 9, Phase 1 Precertification Physical Sampling." The attached comments address our concerns with the document.

If you have any questions, please contact Donna Bohannon or me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

Attachment

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH
Mark Shupe, HSI GeoTrans
Francie Barker, Tetra Tech EM Inc.
Manager, TPSS/DERR, CO

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PROJECT SPECIFIC PLAN
AREA 9 PHASE I PRECERTIFICATION
PHYSICAL SAMPLING PSP

Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: G
Original Comment #:
Comment: Is there a reason that precertification documents do not have numbered lines? It would make it more convenient for referencing comments.

Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2-Purpose Pg. #: 1-1 Line #: Code: C
Original Comment #:
Comment: There isn't much explanation on why the three metal ASCOCs are being analyzed and their potential for exceeding off-property soil FRLs. Please clarify and provide a better (brief) discussion for collecting these analyses.

Commenting Organization: OEPA Commentor: OFFO
Section #: 1.1 & 1.2 Pg. #: 1-1 Line #: Code: C
Original Comment #:
Comment: In the second paragraph of section 1.1, it states that the physical sampling will be done *in conjunction* with real-time scanning. However in section 1.2, it states that the sampling will be done *prior to* the real-time scanning. Which is correct? It does appear more logical that real-time scanning or screening would take place before the physical sampling.

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1 Pg. #: 2-1 Line #: Code: C
Original Comment #:
Comment: This paragraph notes that any changes will be documented in the Variance or Field Change Notice (V/FCN). It should also note that these changes will be faxed to the OEPA as they occur. In the past, Ohio EPA has usually been the last to know of the changes taking place.

Commenting Organization: OEPA Commentor: OFFO
Section #: 2.1 Pg. #: 2-1 Line #: Code: C
Original Comment #:
Comment: This paragraph discusses the case of moving sample locations and how it will be documented through the V/FCN form. Again, this change notice should be made to Ohio EPA as soon as possible. Before sample is collected at the new location.

Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 2-1 Pg. #: Line #: Code: C
Original Comment #:
Comment: DOE has not proposed any inorganic pre-cert sampling in non-plowed areas. Is there reason to believe a difference exists between non-plowed and plowed inorganic concentrations?

Mr. Johnny Reising
June 22, 1998
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Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 2-1 Pg. #: Line #: Code: C
Original Comment #:

Comment: Ohio EPA believes bias samples should be located under the electrical towers. These areas are not necessarily homogeneous with surrounding soils as they have not been plowed and may have more concentrated levels of COCs. Obviously, surface samples would be most appropriate in these areas.

Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 2-1 Pg. #: Line #: Code: C
Original Comment #:

Comment: The PSP should be revised to include a figure showing all areas inaccessible to the RTRAK or HPGE due to topography, structures or vegetation.

Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 2-1 Pg. #: Line #: Code: C
Original Comment #:

Comment: The PSP should be revised to include data and information from the STP removal action.

Commenting Organization: OEPA Commentor: OFFO
Section #: DQOs, Section 7.3 Pg. #: 6 Line #: Code: C
Original Comment #:

Comment: In the second paragraph and the two bullets, the WAC limit and total uranium's detection limit is discussed being appropriate for WAC purposes. This should be written in the context of total uranium's FRL and detection limit being used for WAC attainment. Please correct.